

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 7**

THE DETROIT NEWS, INC., LIMITED PARTNER)	CASE NO.
AND ITS AGENT DETROIT NEWSPAPER)	
PARTNERSHIP, L.P., A LIMITED PARTNERSHIP,)	
A/K/A DETROIT MEDIA PARTNERSHIP)	
)	
RESPONDENTS,)	07-CA-132726
)	
AND)	
)	
THE DETROIT FREE PRESS, INC., GENERAL)	
PARTNER AND ITS AGENT DETROIT NEWSPAPER)	
PARTNERSHIP, L.P. A LIMITED PARTNERSHIP)	
A/K/A DETROIT MEDIA PARTNERSHIP)	
)	
RESPONDENTS,)	07-CA-132729
V.)	
)	
)	
)	
NEWSPAPER GUILD OF DETROIT,)	
LOCAL 34022 OF THE NEWSPAPER GUILD/CWA,)	
AFL-CIO)	
)	
CHARGING UNION.)	
)	

**MOTION FOR AN EXTENSION OF TIME TO FILE EXCEPTIONS AND BRIEFS
IN SUPPORT THEREOF**

COMES NOW, The Respondents, Detroit Media Partnership, Detroit Free Press, and The Detroit News, pursuant to §102.46(a) of the National Labor Relations Board's Rules and Regulations, Series 8, as amended, with

this Motion for Extension of Time to File Exceptions and Briefs in Support Thereof. ALJ Susan Flynn issued her Decision on August 12, 2015, which was received by Respondents' counsel thereafter.

Respondents respectfully request an extension of time until **October 12, 2015** to file Exceptions and Briefs in Support Thereof for the following reasons:

- 1) The transcript in this case is over 750 pages. Time is necessary to review the transcript and record, and formulate exceptions and arguments based on the ALJ's recommended Decision and Order. The Request for Extension of Time is reasonable, under the circumstances.
- 2) Counsel to Detroit Media Partnership and The Detroit Free Press had and have the following obligations in the immediate future:
 - A current Arbitration in Hilo, Hawaii, that has consumed this entire week;
 - The Labor Day holiday of September 7, 2015;
 - An anticipated unemployment hearing in Syracuse, New York, that is to be scheduled sometime between September 3, and September 17, 2015; and
 - An American Bar Association NLRB Practice and Procedure Committee Regional Meeting in Memphis, Tennessee, on

September 25, 2015, sponsored by The Zinser Law Firm. L.

Michael Zinser is the Management Chair for the Region, and

Mr. Zinser and Glenn E. Plosa are presenters at the meeting.

This Request is not interposed for the purposes of delay; given the size of the record, the complexity of the Decision and Order, as well as personal and professional obligations of counsel, this Request is reasonable and prudent.

Respondents have contacted the Counsel for the General Counsel and counsel to Newspaper Guild of Detroit, Local 34022 of the Newspaper Guild; Counsel for the General Counsel agrees with the request and counsel to the Newspaper Guild of Detroit does not oppose this request.

CONCLUSION

WHEREFORE, for the reasons explained herein, Respondents Detroit Media Partnership, Detroit Free Press, and The Detroit News respectfully request an extension of time until **October 12, 2015**, to file Exceptions and Briefs in Support Thereof in NLRB Cases Nos. 07-CA-132726 & 07-CA-132729.

DATED: August 21, 2015

Nashville, Tennessee

Respectively submitted,

/s/ L. Michael Zinser
L. Michael Zinser

/s/ Glenn E. Plosa
Glenn E. Plosa

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION FOR AN EXTENSION OF TIME TO FILE EXCEPTIONS AND BRIEF IN SUPPORT THEREOF was filed electronically with the Court's CM/ECF system and served via email and U.S. Mail upon the following this 21st day of August 2015:

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